

EXHIBIT 8

1
2 UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF ILLINOIS
4 EASTERN DIVISION
5 Civil No. 1:17-cv-02246

6 - - - - -x
7 DOROTHY FORTH, LISA BULLARD, RICARDO
8 GONZALES, CYNTHIA RUSSO, INTERNATIONAL
9 BROTHERHOOD OF ELECTRICAL WORKERS
10 LOCAL 38 HEALTH AND WELFARE FUND,
11 INTERNATIONAL UNION OF OPERATING
12 ENGINEERS LOCAL 295-295C WELFARE
13 FUND, AND STEAMFITTERS FUND LOCAL 439,
14 On Behalf of Themselves and All
15 Others Similarly Situated,
16 Plaintiffs,

17 -against-
18 WALGREEN CO.,

19 Defendant.

20 - - - - -x
21 September 17, 2020
22 11:36 a.m.

23 *** HIGHLY CONFIDENTIAL ***
24 *** ATTORNEYS' EYES ONLY ***
25

26 Virtual Videotaped 30(b)(6)
27 Deposition of BRIAN CORREIA, taken by
28 Plaintiffs, pursuant to Notice, before
29 Sharon Pearce, RMR, CRR, CRC, NYRCR, a
30 Registered Merit Reporter, Certified
31 Realtime Reporter, and Notary Public of
32 the State of New York.

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ALSO PRESENT:

MATT ALLISON, Videographer

HILARY BURN DUDLEY, ESQ.,

Caremark in-house counsel

* * *

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21 Q. So if Walgreens' retail price
22 for a drug was \$15, and its PSC price was
23 \$10, it would still report its U&C as the
24 \$15, but it would let you know that its
25 PSC price was \$10, and then you could

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2 change your MAC price to be \$10; is that
3 correct?

4 A. Yeah. What we found out was
5 that the FEP MAC prices were already lower
6 than the clear majority of any of the club
7 price programs that were out there. So
8 the incremental value for this endeavor
9 was very minimal. There might have been
10 some leaders that some of the club
11 programs had. But it didn't amount to
12 anything in the aggregate.

13 Q. But my hypothetical was correct,
14 though.

15 A. Yes. That's correct.

16 Q. And in fact, the whole point of
17 this provision, this -- under the generic
18 drug section, the whole point of this
19 provision was because you knew that
20 Walgreens was not reporting its PSC prices
21 as its U&C prices; correct?

22 A. Correct.

23 Q. And if we can look at Tab T now,
24 which we'll mark as Exhibit 364.

25 MR. PERKINS: Tab T or Tab S?

CERTIFICATION

I, SHARON PEARCE, RMR, CRR, CRC,
NYRCR, a Notary Public for and within the
State of New York, do hereby certify:

That the witness whose testimony as
herein set forth, was duly sworn by me;
and that the within transcript is a true
record of the testimony given by said
witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I am
in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 30th day of September,
2020.



SHARON PEARCE

RMR, CRR, CRC, NYRCR